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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

August 26, 1997

Bryan Stone
RETEC
1011 SW Klickitat Way, Suite 207
Seattle, WA 98134

Re: Final Remedial Design Report, Design Set 1B, Harbor Island Soil and Groundwater Operable Unit

Dear Bryan:

I have reviewed your responses to EPA's comments on the 95% Remedial Design for Design Set 1B and find them acceptable. The only portion which must be revised is the cleanup goal of 200 mg/kg for arsenic, which was initially proposed because it is the MTCA Method "A" cleanup level for industrial soils. However, upon further review I discovered that this MTCA level does not include exposure through dermal absorption or inhalation and would not be adequately protective of industrial workers at the site. The appropriate cleanup goal for arsenic is 32.6 mg/kg which is identified in the Record of Decision (ROD) for the Soil and Groundwater Operable Unit. The ROD cleanup goal is based on protection of industrial workers through ingestion, dermal absorption, and inhalation pathways. Therefore, I request that the arsenic cleanup goal identified in the Remedial Design be revised to 32.6 mg/kg. As a result of this change, additional surface soil sampling should be conducted at the former Lonestar facility to determine the extent of area which exceeds the revised arsenic cleanup level, unless Lonestar elects to pave the entire area with asphalt.

Except for the portions which address the arsenic cleanup goal and the former Lonestar facility, I hereby approve the Final Remedial Design Report for Design Set 1B. Remedial actions for the former Lonestar facility must be delayed until the appropriate sampling and modifications are made to the cap design for that facility. The revised design for Lonestar can be attached as an appendix to the Remedial Design Report at a later time. If you have any questions on this topic, please contact me at 553-7721.

Sincerely,

Keith A. Rose
Remedial Project Manager



cc: Don Verfurth, Carney Badley Smith & Spellman
Mark Valentine, de maximus